

## **Exhibit J**

**Gertie Reingold**

11  
A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF  
GERTIE REINGOLD**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )  
: SS.:  
COUNTY OF BERGEN )

GERTIE REINGOLD, being duly sworn, deposes and says:

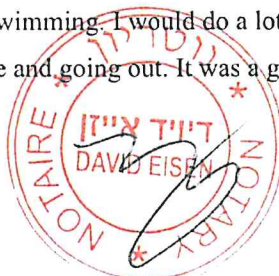
1. I am a plaintiff in the within action, am over 18 years of age, and reside at 161 Huguenot Avenue, Englewood, New Jersey 07631.

2. I am currently 77 years old, having been born on September 26, 1944.

3. I am the wife of Albert Reingold, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from chronic respiratory disease on March 8, 2015. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My husband was my life. I married him when I was 17 years old, and by the time he passed away, we had been together over 50 years. He was a very active man and enjoyed bowling, tennis, horseback riding, and swimming. I would do a lot of these activities with him too. We also enjoyed entertaining people and going out. It was a great relationship.



6. On September 11, 2001, Albert got up like any other day. He took an express bus from Staten Island into Manhattan, heading towards his office near the World Trade Center. As they were going into the Brooklyn-Battery Tunnel, someone called out that they could see smoke. The bus ended up getting stuck about halfway through the tunnel and filled with smoke. Albert was stuck there for quite a while. After what I believe was a few hours, the bus driver let everyone out and told them that they were on their own. He first started walking toward Manhattan. Eventually, he and many other people were turned around and came out of the tunnel on the Brooklyn side. He told me that the smoke was so thick that, if you stuck out your arm in front of you, you could not see your fingers.

7. I got in contact with a nephew who lives in Brooklyn, and he was able to pick up Albert and bring him to his home there. It was hard to know what was going on at the time since communication was limited. Albert and I did not have cell phones.

8. Albert changed immediately after the September 11, 2001, terrorist attacks. The activities he used to enjoy doing stopped that day, and he changed physically, mentally, and emotionally. I took him to the doctor the very day after the attacks, and the doctor also thought that Albert was already no longer the same person.

9. His office was closed for a while after the attacks and moved. It eventually reopened. When it came time to return to work, he told me he did not want to go. The night before he was due to return to the office, he told me that he did not want to get on the bus and did not want to go through the Brooklyn-Battery Tunnel again. I told him not to worry, and I suggested that the bus would take an alternate route through New Jersey. This was not the case though, and when he got on the bus to go to work that next morning, it did go through the tunnel. He tried to act tough and hide his emotions but going through the tunnel gave him anxiety. It started to affect his performance at work too. His work suffered, and after two or three months, he was let go. Albert had been a very active man and was not planning on retiring. He had been working and was expected to continue working before the attacks.

10. The following March, Albert had a stroke. And then a few weeks after that, he had another, more serious stroke. Everything went downhill for him day by day. And moving forward ten years from the attacks, he had a major fall down a flight of steps. His balance was





totally off, and this was the start of vascular parkinsonism. I learned that this happened so acutely at this moment in time because it takes about ten years to develop. I also learned that it can be brought on by exposure to toxic fumes, as he was on September 11, 2001. His mental, emotional, and physical state deteriorated and was never near what it had been before.

11. Albert went to so many different doctors. He had a primary doctor, a pulmonary doctor, a movement specialist, a psychologist, and a psychiatrist, among others. Every single one pointed to the attacks as being the cause of his problems.

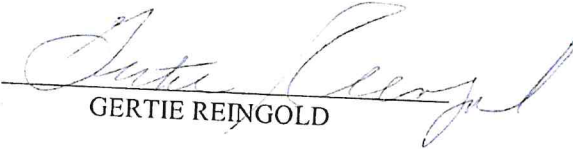
12. Caring for my husband over the years of his illness took everything we had. Albert needed 24/7 help, and I was always involved in his care. For example, I would take him to many of his doctors' appointments. Part of his illness was constant movement too, and so it was dangerous to take your eye off of him. He was unable to accept the fact that he could no longer walk, so he would get up and fall. Because of this, I slept with one eye open or holding his hand for years so that I could monitor him. He also would wake up with hallucinations. This negatively affected both of our sleep. It was not easy.

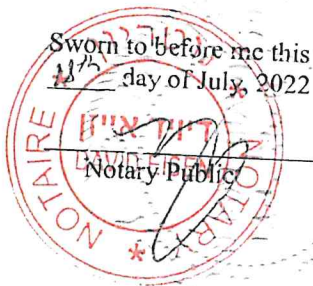
13. As for the financial impact of Albert's illness, I also had to pay for additional home healthcare, and this need for help at home only grew over the years. Eventually, we received some financial support from Medicaid for this home healthcare help, but it was still a huge financial burden for our family. We also had lost Albert's income because he was unable to work for the last 14 or so years of his life, and so our family's income was greatly diminished. I did not know what we were going to do or how we were going to survive, but we got through it. It came to the point that I had to sell my house and move to a small apartment near my kids so that I could live off of what I had received from the sale.

14. I am no longer the same person after seeing Albert suffer through his chronic respiratory illness. I suffer from depression and miss his presence. I also feel cheated out of my life with him, and I feel that he was cheated out of his life too. It is very emotional, and I feel angry. I also remember the different episodes we went through together and times where I was not patient. I beat myself up over this now because it was not his fault. I loved and cared for him, but it was a nightmare. I still suffer from the experience.



15. Albert was a great husband and father. And in our large family, he was everyone's favorite uncle too. Everyone misses him every day.

  
GERTIE REINGOLD



מס' סיוור 24/22

אימות חתימה

אני הח"מ, דיויד אייזן, נוטריון בעל רישיון מספר 21258, מאשר כי ביום 18 ביולי 2022 ניצבה לפני במשרדי ברח' החצב 7א, בית שמש, ה"ה:

גרתי ריינגולד

☒ המוכרת לי באופן אישי;

☒ שזהותה הוכחה בפני לשביעות רצוני  
פי תעודת זהות מס' 337788830 שהוצגה לי  
ידי משרד הפנים בנתב"ג ביום 10.2013.

ושוכנעתי כי הניצבת בפני הבינה הלא  
את משמעות הפעולה וחתימת מרצון  
החופשי על המסמך המצורף וה"א" מן בא  
."א"

ולראיה הנני מאמת את חתימתה של  
גרתי ריינגולד, בחתימת יד בחותמי, 18 ביולי 2022.

שכר נוטריון: 198 ₪, ל מע"מ.

יון  
Notar

Serial No. 24/22

AUTHENTICATION OF SIGNATURE

I, the undersigned, David Eisen, Notary holding license no. 21258, hereby certify that on JULY 18, 2022, the following person appeared at my office at 7A Hehatzav St., Bet Shemesh, Israel:

**GERTI REINGOLD**

☒ who is known to me personally;

☒ whose identity has been proven to me by ISRAEL IDENTITY CARD NO. 337788830 issued by the MINISTRY OF INTERIOR in BEN GURION AIRPORT on OCTOBER 8, 2013.

And I am convinced that the aforementioned person standing before me understood fully the significance of the action and voluntarily signed the attached document marked with the letter "A".

In witness whereof, I hereby authenticate the signature of **GERTI REINGOLD** by my own signature and seal this day, JULY 18, 2022.

Notary Fee: NIS 198, including VAT.



**Stephen Marcus Reingold**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF  
STEPHEN MARCUS  
REINGOLD**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY    )  
                                  : SS.:  
COUNTY OF BERGEN     )

STEPHEN MARCUS REINGOLD, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at Avnei HaHoshen St. 15, Apt. 9, Modiin, Israel 7176888.
2. I am currently 49 years old, having been born on April 14, 1973.
3. I am the son of Albert Reingold, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from chronic respiratory disease on March 8, 2015. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. I had a wonderful relationship with my father. I cannot think of having a better father or a better relationship with him. We would get ready and eat breakfast together in the morning, play sports, go to Yankees games, swim, do schoolwork, go to the synagogue, and go on hikes. We would do everything together – we did life together. For example, we would go to



the Catskills in the summers. He would come up after he finished work every Thursday, and then we would spend all Friday together. We would go to the pool, to the gym, the sauna, and just hang out. That was life, and the two of us were the best of friends. There is no one I have confided in more except for maybe my wife. He was my idol, and there is no one I have looked up to more than him and no man I respect more than him.

6. I remember my father telling us how on September 11, 2001, he was stuck on the bus in the Brooklyn–Battery Tunnel and it filled with smoke. He thought he was going to die, as did everyone else with him. The smoke was so thick that he could not see his hand in front of his face. He could not breathe. By some miracle, someone opened the door to the adjacent tunnel and led him and the others to relative safety. This experience was extremely overwhelming for him both physical and emotionally. I also remember my father trying to go back to work at his office in lower Manhattan in the period following the attacks.

7. After September 11, 2001, my father was no longer the same. Something was off with him. He was more stressed out and no longer as calm or happy as he had been. He was no longer coordinated and would forget and miss things. He would try to hide it, but it was obvious to me. You could tell something was wrong.

8. My father needed to visit doctors a lot and could not be left alone. He needed help doing little things around the house and could no longer be relied on to do things. We could not rely on him for anything anymore. And if he wanted to visit the grandchildren, he could not do it himself. He would have to be brought, and one of us would have to pick him up or arrange a ride for him. All of this took time, and it became more taxing as the years went on. I had to make sure I was available to help and needed to give up opportunities with work so that I could watch him and help him with whatever he needed, like helping him to the bathroom or bathing him. It would be about a day every week where I would be with my father helping out.

9. My mother also started to need more help because she had additional responsibilities with my father, and then my father was not able to do things around the house that he used to do for her. Even simple things like running errands or fixing things around the house like a leaky faucet.

10. The emotional impact of my father's illness was devastating for me. He was the greatest man I had ever known and one of the most important people in my life, and I saw him

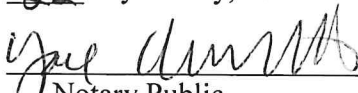
fall apart. I wanted to share time with him as an adult and be able to show him the person he helped me become. He barely got to see that. Little by little, he fell apart and things slipped away. I wanted to give back to him after he spent so many years investing in me, and what I had to give back to him was nursing care. I could no longer go to a ballgame with him or have a deep conversation. It was absolutely terrible in that respect. One's 60s are not a time where you are supposed to fall apart – you are supposed to enjoy your 60s.

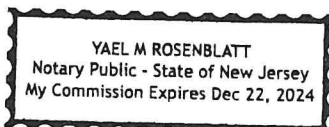
11. I had a conversation with my father in the last year of his life, and I told him that I knew he was frustrated. It was hard to understand him at this point, but he told me that I did not know the half of it. I tried what I could to make him comfortable, but he was suffering immensely. To see that in your parent is horrible. This also had a terrible effect on my mother, which upset me further. My parents loved each other and had a lot of fun together, but their retirement years together were stolen from them.

12. People loved and adored my father, and he was the favorite uncle in our family. I worry about what the decade of deterioration that he suffered through has done to how people will remember him. My wife and oldest child have very few memories of when he was healthy, and my other children were so young at the time that they really only knew him when he was sick. When I showed them a video of him at my bar mitzvah, when he was in the prime of his life singing, dancing, and speaking, they were in shock. They only know a broken man. It's horrible, and it saddens me that his relationship with the new generation and others were stolen from him and us. I hope people remember him for the person he was before the September 11 attacks.

  
STEPHEN MARCUS REINGOLD

Sworn to before me this  
22 day of July, 2022

  
Notary Public





**Peter Joseph Reynolds**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF  
PETER REYNOLDS**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF RICHMOND    )

PETER REYNOLDS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 72 Mobile Avenue, Staten Island, NY 10306.

2. I am currently 55 years old, having been born on November 2, 1966.

3. I am the brother of Mary Elizabeth Reynolds, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My sister passed away from peritoneal carcinomatosis on October 22, 2014, at the age of 51. It was determined by the World Trade Center Health Program that this illness was causally connected to her exposure to toxins resulting from the 9/11 terrorist attacks.

5. We were very close, always spending time together. We worked together, so we pretty much spent all day together. Mary loved to rescue animals. I remember we found stray cats living near my house. I called Mary, and she was there in ten minutes to pick up the cats and get them cleaned and fed. Mary was a very loving person. My sister was an independent

and proud woman, and she was hard working. The past few years before Mary passed, she was helping me out financially.

6. Mary had suffered for many years before her two-year cancer battle. She had sleep apnea and suffered from PTSD. I remember Mary telling me that she had pain on her right side. We told her to go to the doctor. She learned of the cancer diagnosis, but told me it was going to be okay and that they were going to remove the tumor through surgery. The diagnosis sent her into depression. She had to stop working because of her illness. It was very difficult to watch because she had a child, Shannon, to take care of. She wanted the best for Shannon. She had the will to fight. It was a heartbreaking story all the way to the end...at first, she was okay after her hysterectomy. She was getting back up on her feet, and had even met someone. She was starting to work again, even though she could only pick up part-time jobs. Then her cancer came back again a year later, and the doctors told her she only a short time to live. The next call I got was that she was dead. Seeing her scars, her nausea, it was so sad. I remember her still trying to go to the bathroom towards the end, hoping that her intestinal blockage would pass. She didn't go down easily. She did what she had to do until the very end.

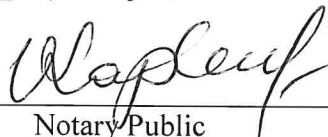
7. Mary fought as hard as she could. This illness took everything away from her. Her whole life, she was a pauper. Mary raised herself up, she put herself through college. Then, she fought hard to land a job in financial technology, so she could make a comfortable living for herself and her daughter. She was a woman in a man's field. She beat all the odds. Then, she lost everything to 9/11. I saw her go back into the city to take menial jobs to put food in her and her child's mouths. She kept the heat in her home at sixty-two degrees just to save money on her bills. The way the cancer came back and killed her, it stripped her of her life more than once. Yet, I never saw her cry for herself.

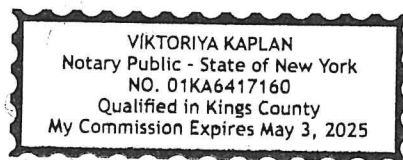
8. The terrorist attacks on 9/11 wasn't just an attack on our country, it was the day that started Mary's life down an awful and painful path, and our family right along with her. The people that caused these attacks didn't just cause her to be sick, they took her from us, leaving us to wonder forever why this had to happen to her. She was a beautiful, loving person, and didn't deserve the hand she was dealt. In a way, we lost Mary twice—once to her cancer,

and once to her death. I only hope that one day I can face death with half as much dignity as Mary did.

  
PETER REYNOLDS

Sworn to before me this  
13<sup>th</sup> day of April, 2022

  
Notary Public



**Frank Rooney**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF  
FRANK ROONEY**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF SUFFOLK     )

FRANK ROONEY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 277 Weeks Avenue, Manorville, New York 11749.

2. I am currently 46 years old, having been born on May 28, 1976.

3. I am the brother of KEVIN ROONEY, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. Kevin passed away from colon cancer on January 22, 2017, at the very young age of 38. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Kevin and I were best friends. We are only two years apart and were very close. We liked hanging out together, hiking, and doing some traveling. We had many mutual friends who we both enjoyed spending time with. We chose Kevin to be our daughter's godfather, an honor I cherish to this day. While we didn't live very close in proximity (I lived in Long Island, and he lived upstate), Kevin and I spoke all the time and would visit each other as often as



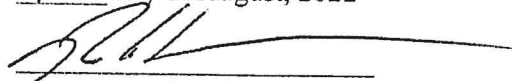
possible.

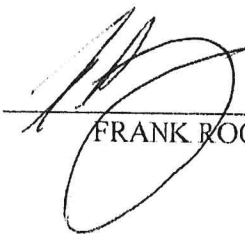
6. Kevin worked at the World Trade Center site for many days, long shifts at a time. He would come home with his nostrils full of dust and debris. He would blow his nose and there would be large amounts of dust in his mucus. While he didn't like to talk much about it, he did convey to his immediately family that what he saw there was horrific. He described how a smell of metal and burning flesh hung in the air at the site.

7. In approximately 2015, while Kevin and I were attending a mutual friend's birthday party, Kevin confided in me that he wasn't feeling well. After seeing several doctors, Kevin was diagnosed with Stage IV colon cancer. The diagnosis was an utter shock. Kevin's condition rapidly deteriorated, and the cancer spread to his liver and brain. My brother went through hell. He was in constant horrible pain and was unable to do anything without assistance, including going to the bathroom and showering. He became withdrawn. Toward the end of his life, he was confined to either a chair or bed, both of which he had to be carried in and out of. His coworkers purchased a Lazy Boy recliner for him to try to make him as comfortable as possible. Kevin lost a tremendous amount of weight, nearly 100 lbs. Seeing my brother change so drastically and be so ill was the worst thing I've ever witnessed in my life. It was heartbreaking for me to watch my brother wither away to almost nothing and have the life sucked out of him. He had always been so vibrant and strong. This was not supposed to be happening to him.

8. Kevin received at-home hospice. His entire family and many friends were gathered around him when he took his last breath. The pain I feel having lost my brother is immeasurable. He was truly loved. Our entire family will never be the same.

Sworn to before me this  
9<sup>th</sup> day of August, 2022

  
\_\_\_\_\_  
Notary Public

  
\_\_\_\_\_  
FRANK ROONEY

RICHARD A. SERENO  
Notary Public, State of New York  
No. 01SE6256055  
Qualified in Suffolk County  
My Commission Expires February 21, 2024



**Valerie Rossi**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF ROBIN ROSSI**  
**on behalf of VALERIE ROSSI**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NORTH CAROLINA    )  
                                      : SS.:  
COUNTY OF ROWAN            )

ROBIN ROSSI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1790 Cranwell Drive, Mount Ulla, North Carolina 28125.
2. I am the son of Robert Carlo Rossi, upon whose death my claim is based.
3. My mother, Valerie Rossi, was also a plaintiff in the within action and was pursuing her own solatium claim based on the illness and death of her husband, Robert Carlo Rossi.
4. Valerie passed away on January 17, 2020, subsequent to the commencement of the within action. I am the representative of my mother's estate, having been issued Letters Testamentary on May 20, 2021, by the Surrogate's Court of the State of New York, County of Suffolk.
5. I submit this Affidavit on Valerie's behalf in connection with the pending motion for a default judgment and in support of her solatium claim.

6. Valerie's husband, Robert passed away from prostate cancer on April 13, 2016. It was medically determined that this illness was casually related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

7. My parents always had a good relationship. They were married for over 50 years. They were by no means extravagant, but they shared a love of Atlantic City. They did a lot of things together—built a home, collected antique dolls, and helped me, their son, with many projects. My parents were truly partners in life in every sense. They took great pride in our home and family.

8. My father wasn't in lower Manhattan on 9/11, but he responded to the World Trade Center site soon after. He was a retired FDNY firefighter, so he could get closer to the rubble at Ground Zero than other civilians could. He would go down there with a friend, another former FDNY firefighter, who also ended up passing away due to his exposure. They would bring cases of bottled water for the firemen to flush out their eyes. I know that my father responded to the World Trade Center site at least 5-10 times. He didn't talk about it. Many of them didn't talk about it because what they saw was so traumatizing.

9. In 2012, my father began to have problems urinating. My mother knew that my father was sick before anyone else. Robert was a proud man. He did not want to see a doctor, but my mother wanted him to. This became a source of strain on my parents' relationship. They argued about it often. My mother knew he needed to see a doctor despite his refusal. She tried her best to get him to go, but by the time he finally did, it was too late.

10. Robert's sickness was devastating to my mother, in all aspects of her life. She watched her husband and best friend wither from a strong man down to nothing. My mother was my father's primary caretaker, although I also heavily assisted in taking care of my father. His illness also had a negative effect on my mother's financial situation. Her source of income was depleted once Robert passed. She had to rely heavily on me and my wife once Robert became ill. We lived with her so we could help her out.

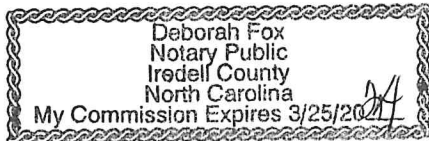
11. My mother was already an older woman when my father became ill. She didn't live much longer after my father passed away. She lost her best friend, and emotionally she was crushed. She was a strong person, but my father's death took a serious toll on her. She would

often break down in tears. I don't think she ever emotionally recovered from the stress of dealing with his illness. Once a vibrant, active woman, my mother fell into a deep state of depression and had very little lust for life. My dad was the love of her life until the day she died. She always remembered him that way.

  
\_\_\_\_\_  
ROBIN ROSSI on behalf of  
VALERIE ROSSI

Sworn to before me this  
20 day of May, 2022

  
\_\_\_\_\_  
Notary Public



**Joseph M. Romeo**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF**  
**JOSEPH M. ROMEO**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF NEW YORK    )

JOSEPH M. ROMEO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 27 North Moore Street Apt 8F, New York, New York 10013.

2. I am currently 60 years old, having been born on September 14, 1961.

3. I am the husband of Rita Saverino, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My wife passed away from metastatic spindle cell sarcoma of the liver on November 20, 2014, at age 49. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Rita was my life. We had two kids who were young at the time, and we had a beautiful family and life. We coached our kids' sports teams together and did everything together. We had a place upstate where we would garden together. We did dinners, lunches, and museums. We played golf together and went to the movies. We loved traveling and going on vacation. Every spare moment, we had was spent together. We were very involved in each



other's lives.

6. Rita worked in the exposure zone near the World Trade Center. She worked for Deutsche Bank on Wall Street. She would walk from the subway station to her office every single day. We also lived nine blocks away from the World Trade Center. Our back bedroom windows look out on the towers. We saw the planes hit the towers and witnessed them come down on September 11, 2001. We evacuated the exposure zone that day and stayed in the city for a few days before living in Westchester for about a month. We were displaced for a little bit. We did not return to our home for a month until the insurance company cleaned out our apartment. We breathed in a lot of the ash in the air once we returned. Rita returned to her office as soon as possible, and she continued to work until she became ill.

7. Rita was diagnosed with cancer in 2010. She wasn't feeling well and went to see a doctor. The doctor gave her a referral to another doctor, but she didn't know it was an oncologist at first. She just had a doctor's name and location. She called me from her appointment and told me she was at Sloan Kettering. I dropped everything I was doing to meet her there. We found out her tumor was inoperable and that she had six months to live. I was devastated, but we were fighters and determined to do all that we could to extend her life. We ended up going to six more doctors until the seventh doctor said the tumor could be operated on.

8. Rita underwent surgery for her tumor, which bought her five more years. Our lives changed completely during the time she was sick. I became a triage nurse for five years. She was in and out of the hospital constantly. I was in and out of the hospital constantly. I was an advocate for Rita and her greatest supporter. I cared for her every minute of every day from the time she was diagnosed.

9. It cost a lot financially, but I would have given my right arm to keep her. We lost a lot of income—in the millions of dollars. Her final bonus was seven figures. She was the breadwinner of the household. Rita was on disability, and we were fighting insurance companies five days per week to try and get some of our money back. She had multiple surgeries, and I had to take time off work when they happened, and to take care of her after them. I took time off from trading to take care of her. My full focus was on her.

10. Her illness changed me. I'm not the same person I was before Rita was sick. There are no words to describe the impact of her illness on my life. I'm raising two sons on my



own now. Being her husband was the greatest job I ever had, and I felt like I failed at it. The last eight years as a single father with two children has been tough. My oldest son just graduated from Georgetown last year, and he now works at the same bank his mother did. It's heartbreaking that she didn't get to be there for his graduation. My youngest son lost his personality and sense of humor since his mother's passing and watching him lose it was so hard. There's a hole in our lives that can never be filled. I miss her, the good times we had, the smiles.

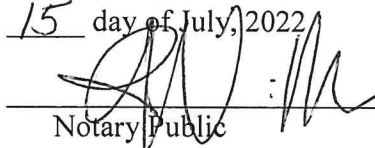
11. I still consider myself lucky to have known her. Her legacy is first and foremost to her family. We used to argue about how to raise our kids. Before she passed, I promised her that I'd always consider what she would do for the kids every time I had to make a big decision about their future going forward. I still take her word into every decision. She was highly beloved at work and had a limitless ceiling. Who knows what she could be doing now at work if she were here—she could be running Deutsche Bank? She won a lot of awards and even won awards posthumously. She joined the Sarcoma Foundation of America and helped them increase the amount of money they raised to over \$250,000. I still talk to her friends, and she is still missed by all. And that was all secondary to our family. She would always be there for our kids no matter how ill she was feeling. She left a legacy for them.



JOSEPH M. ROMEO

Sworn to before me this

15 day of July, 2022



Notary Public

RENEISHA WILLIAMS  
NOTARY PUBLIC, STATE OF NEW YORK  
NO. 01WI6421579  
QUALIFIED IN KINGS COUNTY  
COMMISSION EXPIRES 09/07/2025

**Luca Vincent Romeo**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF  
LUCA VINCENT ROMEO**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF NEW YORK    )

LUCA VINCENT ROMEO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 27 North Moore Street, Apt 8F, New York, New York 10013.

2. I am currently 23 years old, having been born on January 9, 1999.

3. I am the son of Rita Saverino, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My mother passed away from metastatic spindle cell sarcoma of the liver on November 20, 2014, at 49 years old. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Rita was an amazing mother. She always prioritized my brother and me over everything in her life. While I was growing up, she was one of the only people I could truly talk to and share everything with. She encouraged me to try anything I showed interest in. She would come to all my baseball games until she got sick and then would follow them virtually, when she could. She took me to plays and sporting events, new restaurants she thought I would

like, and she even took me to Europe for my tenth birthday. Even when she was sick, if she was not in the hospital, she would find ways to spend time with me and remind me how much I meant to her.

6. My family lived in an apartment in TriBeCa, not far from the World Trade Center. I was very young on September 11<sup>th</sup>, 2001, so I don't remember much from that day. But I do know that we were in lower Manhattan when it happened. It was my first day of preschool. I know that we had soot in our apartment, and that we had to have it cleaned.

7. When my mom was diagnosed with cancer, I didn't understand the gravity of her illness. I had faith that nothing bad would happen to her. But I soon started to recognize that my mother's health was changing. Over the next four years, my mother had an extremely hard struggle with cancer. Every few weeks, there were new complications with her illness. It was really hard for me; I had to go to therapy for a few years. I spent a lot of time at different hospitals with my mom. I coped with my mother's illness by devoting myself to school and extra-curricular activities. I remember bringing my book bag to the hospital and doing homework in a lot of hospital waiting rooms. It was painful at the time, but I recognize now that I was lucky that I had all that extra time to spend with my mother.

8. I watched my father drop everything to take care of my mom for four years until she passed. He was drained. Our family income changed because my mother was too sick to work. When my mother passed, my father stepped in and raised my brother and me, who were still young at the time. I was only fifteen years old when my mother died.

9. I think about my mom every day, but it's painful knowing that she's not here to see the milestones in my life. I think about the person she was and the memories we had. I know my life would be immensely different if she was still here, and that hurts to think about. I thought about what it would be like if she were there for my high school graduation, my acceptance to college, and my college graduation. During those moments, I would look for an empty chair in the room and picture her there.

10. My mother was an amazing, selfless woman. One of the most emotional days of my life was at her wake, watching the hundreds of lives she touched and seeing people share their stories and their tears. Now, I realize I am following my mother's path in life. My mother has inspired me so much that I am now working at the same job she was ten years prior. I wish

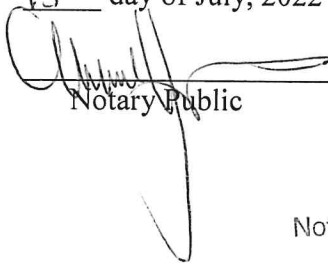
so badly that I could speak with her again, get her advice, and hear her thoughts on my life. I think I subconsciously followed her life path to try and get closer to her. In some ways, that has only created more of a desire to know her and have her here. She was the strongest person I have ever met and will ever meet. I watched her battle cancer for four years, but she always hid her struggle from my brother and me. She is an inspiration not just to me, but to so many people. I'm lucky I got as much time with her as I did.



---

LUCA VINCENT ROMEO

Sworn to before me this  
15<sup>th</sup> day of July, 2022



---

Notary Public

**MICHAEL YORIO**  
Notary Public, State of New York  
No. 01YO6260718  
Qualified in Nassau County  
Commission Expires April 30, 2024

**Breanna Schiavone**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF  
BREANNA SCHIAVONE**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF SUFFOLK     )

BREANNA SCHIAVONE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 498 North 4<sup>th</sup> Street, Lindenhurst, New York 11757.

2. I am currently 27 years old, having been born on August 18, 1994.

3. I am the daughter of James Anthony Schiavone, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic colon cancer on December 12, 2017, at the age of 49. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I was 23 years old at the time of my father's death.

6. I had a great relationship with my father. Although I was living at college in the years immediately prior to his illness, we were still constantly in touch. We enjoyed watching the same television shows and would often discuss them together either on the phone or using FaceTime. And when I was home, he would always help me get around and socialize with my



friends. He even became a second father to many of my friends since he would see them often. I remember in my teenage years, he would stay up late to get us tickets to see my favorite bands and would then drive us several hours away so that we could attend the concerts. He was a great father and was always doing so much.

7. My father was a member of the New York City Police Department and initially went down to Ground Zero on September 11, 2001, to help with the search and recovery efforts. I was young at the time, but I understand that he continued working at Ground Zero as a part of these efforts for months afterwards. One of my vivid memories is going to the September 11 Memorial & Museum with him when it first opened. This was one of the few times I saw him get so emotional. We did not discuss many of the details of his experience at Ground Zero.

8. I was at college when my father began getting sick. It was graduation weekend, and I had not seen him for a few months. When he walked into my house that weekend, I could instantly tell that he looked off. It was hard to explain at the time, but he looked different to me. My house at college was always very warm as well, and I remember distinctly that my dad was freezing when he visited. This was unusual to me, as he was the type of person who was never cold and would even wear shorts in winter. And after the graduation, he started to feel physically different and went to the doctor.

9. After going to the doctor, he was referred to a gastroenterologist and tests showed that his iron was low. I understand this can be one of the early signs of cancer. I remember there being several other doctors' appointments in a short period of time. I expected the appointment where they were due to receive the results to only take about an hour. But when several hours had passed without news, I knew that something was wrong. My parents came home and told us that my father had been diagnosed with stage IV colon cancer.

10. By this time, I had graduated from college and was working full time. I was very work-oriented and did not want to miss any time or days at work. However, I did need to miss some days to help care for and spend time with my father as he became sicker and sicker. And other days, I was late, as my father needed help with something when I was planning on leaving for work. Being in a situation like this makes you realize what is important and how to prioritize your time. Helping to care for and being with my father was most important to me.

11. I was also present for my father's surgery to reverse his colostomy bag and

remove the remaining cancer. Unfortunately, the doctors were not able to remove the remaining cancer. They told us that things did not look good and urged us to do things that we enjoy with my father. That was a very memorable and difficult experience.


12. It has been hard emotionally since losing my father. It will be five years this December since he passed away. Some days, it feels just like yesterday. Other days, it feels like it has been many years. Sometimes, I need to watch videos on my phone just to listen to his voice in case I forget. It is also hard to see my other family members upset. For example, it is hard seeing my younger siblings upset. I feel there is nothing I can do to help. I have my bad days as well.

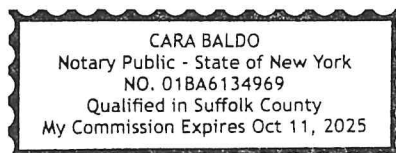
13. I also think about all the opportunities and experiences we will miss without my father. Some days, I will wake up and rush to show him something on my phone before realizing that he is no longer there. Other times, I think about the things I cannot share with him, such as accomplishments. I recently earned another degree and graduated from nursing school, but he was unable to be there for that. I also think about things like marriage or having a child. My father will not be there to share in any of those experiences with me either.

14. My father meant so much to so many people. He made friends with everyone, and even acted as a father to many of my friends as well. He was always a good person and taught me good values. I owe so much of what I have become to him.

  
BREANNA SCHIAVONE

Sworn to before me this  
2nd day of August, 2022

  
Notary Public



**Cristina Rose Schiavone**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF  
CRISTINA ROSE SCHIAVONE**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF SUFFOLK     )

CRISTINA ROSE SCHIAVONE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 498 North 4<sup>th</sup> Street, Lindenhurst, New York 11757.

2. I am currently 21 years old, having been born on October 28, 2000.

3. I am the daughter of James Anthony Schiavone, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic colon cancer on December 12, 2017, at the age of 49. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I was 17 years old at the time of my father's death.

6. My father was my best friend. I am the baby in my family, and so I felt like daddy's little girl. He would take me wherever I needed to be and pick me up whenever needed. Whether I was with friends at school or out socializing, he would always be there. He also taught me how to drive, and he did many typical things that a father would do for his daughter. I would

also go with my dad if he ever needed to shop just so I could spend time and joke with him. This was true when I was younger too – I was always by his side.

7. I was very young at the time of the September 11, 2001, terrorist attacks, but growing up I always knew about it. My father worked at the New York City Police Department, and he told me stories about rushing to the World Trade Center on the day of the attacks and what he breathed in. He wanted to be there and to help. I understand that he continued working at Ground Zero for the following three months. I never understood the extent of his exposure until years later when he became sick. It was a shock for me when he did become sick.

8. I am a very visual person and typically recognize when people are not feeling well or their behavior changes. I remember that my father was suddenly freezing all the time. This was unusual as he, like me, was constantly warm. I had heard stories of first responders who went to the World Trade Center area during and in the aftermath of the attacks becoming sick, and so I urged him to go to the doctor. He went to get tested after we came home from my sister's college graduation. It was early June, the end of my sophomore year of high school, when I came home from school and saw my family and extended family gathered together. They looked like they had seen a ghost. That is when I realized that it was cancer, and it was serious. They confirmed this for me, and I remember crying and it being a very emotional day.

9. One of my friend's fathers had passed away from cancer, so losing one of my parents to it had always been a fear of mine. After my father was diagnosed, I tried to spend as much time with him as I could and made sure to cherish the moments that we had. I would sit with him and would go and get anything that he needed. I was always by his side and would visit him in the hospital as soon as and whenever I was allowed to. If I had to miss school or social events, I would so that I could spend the time with my father. It did become hard at times to do this though because of how sick he became.

10. I will never forget the day my father passed away. The night before he passed, we were upstate, and he called us on FaceTime. Seeing his face made me realize this was it. We came home so that we could say our goodbyes.

11. It has become harder emotionally with the passing of time, and I realize this more as I am getting older. I am seeing people get married and have children. I know that when I get married, I will not have my father to walk me down the aisle. He will not come back into my life




and left it so soon. He was not even able to see me graduate from high school. He will not be here for so many milestones in my life, and this realization is especially difficult for me. It makes me upset to think about. I try to find a way to live with it, but the pain I have is always going to be here.

12. After his loss, I pushed my family away, and I lost my best friend. All I wanted was my father again, and I would visit his grave at the cemetery all the time. I realize now that my family is all I have, so I find a way to survive and take it day by day. Him not being here physically is very hard.

13. My father meant so much to so many people. He had a great relationship with many of my friends, and they felt like they lost a second father when he passed away. He had an effect on everybody's life, not just ours. I will cherish the moments I had with him. I miss him dearly.

  
CRISTINA ROSE SCHIAVONE

Sworn to before me this  
8 day of July, 2022

  
Notary Public

**SARAH JANE CAMPBELL**  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 01CA6280036  
Qualified in Nassau County  
Commission Expires April 15, 2025